STATE OF CALIFORNIA

PETE WILSON, Governor

AIR RESOURCES BOARD
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MANUFACTURER'S ADVISORY CORRESPONDENCE #95-08

October 19, 1995

TO: ALL MANUFACTURERS OF UTILITY AND LAWN AND GARDEN EQUIPMENT ENGINES
ALL OTHER INTERESTED PARTIES

SUBJECT: Optional Application Format for Certification of Carryover Utility and Lawn and Garden Equipment Engine (ULGE) Engine Families for 1996 and Subsequent Years

Enclosed is an Air Resources Board's (ARB's) Manufacturers Advisory Correspondence (MAC) that provides an optional format for the certification of carryover ULGE engine families. When a previously certified engine family is recertified for a subsequent year, an abbreviated application will be allowed as an option (Mail-out 92-57). It should be noted that the full application for certification will be required for all new engine families certified for the first time.

If you have further questions on this matter, please contact Mr. Duc Nguyen, Manager, Certification Section, or Mr. Dean Hermano, staff, at (818) 450-6103

Sincerely,

K. D. Drachand, Chief
Mobile Source Division

Enclosure

MANUFACTURER'S ADVISORY CO_RESPONDENCE #95-08

State of California
AIR RESOURCES BOARD

SUBJECT: Optional Application Format for Certification of Carryover ULGE Engine Families for 1996 and Subsequent Years.

APPLICABILITY: All ULGEs for 1996 and Subsequent Years.

REFERENCES:

1. Title 13, California Code of Regulations (CCR).
2. Mail-out 94-24, Notice of Public Hearing to Consider Amendments to the Emission Control Regulations for 1995 and Later Model Utility and Lawn and Garden Equipment Engines (Clean-up Amendments).
3. California Exhaust Emission Standards and Test Procedures for 1995 and Later Utility and Lawn and Garden Equipment Engines, amended May 26, 1995.
4 Mail-out 92-57, Small-Engine Certification (Guidelines for Certification).

[References to the above documents are indicated by brackets]

DEFINITIONS: The following definitions will apply for purposes of this MAC.

"Carryover Engine Family" means an engine family that has the same emission characteristics [Ref: 3, Section 17] as another engine family that was certified in a previous year. For purposes of certification, the carryover engine family shall be considered to be within the same engine family that was previously certified, and the certification data and information of the previously certified engine family shall be applicable to the carryover engine family.

"Running Change" is an emission-related revision to an engine family that occurs after an Executive Order is issued, and is to be implemented on engines within the family during the production.

"Field Fix" is an emission-related revision to an engine family that occurs after an Executive Order is issued, and is to be implemented on engines within the family that has completed the production process, for example, engines that are being stored in the manufacturer's or distributor's warehouse for shipping, or in customer use.

DISCUSSION:

The ULGE regulations were approved by the Board in December 1990. These regulations are applicable to ULGEs produced on or after January 1, 1995, [Ref.:1, Section 2400(a)(1)]. The regulations include exhaust emission standards and test procedures, an emission-related component defect warranty, assembly-line quality-audit and new engine compliance test

procedures, and provisions for emission control system (ECS) labels. In July 1994 the Board approved amendments that clarified and improved the ULGE regulations [Ref.: 2].

In order for a ULGE to be legally sold in California, it must conform with all emission regulations and subsequently certified with an Executive Order. Engine family certifications are granted only for the calendar year production as specified by the Executive Officer [Ref.: 3, Section 27(a)(2)(ii)]. Moreover, the regulations require that the manufacturer maintain general records of the applicable ULGE, and submit a properly completed application in accordance with the format prescribed by the ARB for the appropriate year of production [Ref.: 3, Section 30(a)(1)(ii)]. In this regard, the ARB has provided guidelines for the preparation of yearly applications for certification [Ref.: 4]. Such applications include information that detail various aspects of an engine family's compliance with the regulations (e.g., test fuels, equipment, test procedures, labeling, warranty, and emission data, etc.). An application prepared in the manner above is the ARB's primary source of information for determining compliance with the regulations for any new engine family certification.

For engine families that are carried over from a previous certification [Ref.: 3, Section 18(g)], however, much of the required information would be the same as was provided for the initial certification. To resubmit such information in its entirety for subsequent yearly certification would be redundant as well as an unnecessary burden to the manufacturers. In an effort to streamline the certification process where warranted without compromising compliance with the regulations, the ARB will permit an optional abbreviated application format as described in this MAC for such carryover engine families. The abbreviated format will not require the ULGE manufacturer to resubmit information that does not change from year to year, including test fuels, test equipment, test procedures, and general technical descriptions. If the ULGE manufacturer determines that a new worst-case test engine is required for the carryover engine family, the manufacturer should update its test engine selection information and submit the new emission data for certification. Furthermore, updates to the abbreviated application should be submitted for all other changes that affect the application, e.g., part number changes, label relocation, etc.

Emission control labels are permitted to be carried over per ARB Mail-out 92-57 [Ref.: 4, Chapter 3.7.2] for certification to the same standards, i.e, no change is required to the engine family name or the compliance statement. Cosmetic changes and non-emission-related modifications to the engine family will not require a revision to the label. The exception to this allowance is when a running change affects the engine family's determinators [Ref. 3, Section 17], thus creating a new engine family. In such a case, the application does not involve a carryover engine family.

The emission control system (ECS) warranty statement is not expected to change when a manufacturer applies for carryover certification. Hence, the warranty statement may also be carried over. However, manufacturers should provide a generic reference to their engines when indicating the applicable production year so as to not confuse customers about the warranty's applicability. For example, it is better to use the phrase "1995 and later" instead of "1995" in the carryover warranty.

A manufacturer electing to use the optional application format should submit a certification request letter that indicates that the subject carryover engine family does not have any changes from the previous certification, and that the previous certification information is applicable to the carryover engine family. If there are changes to the previous certification, but such changes do not affect the emission characteristics of the previously certified engine family (i.e., the changes do not create a new engine family), the application of the carryover engine family should indicate all such changes by updating or revising the affected pages or portions of the application that is provided with the certification request. The certification request letter should also provide a summary of the page numbers that are submitted as a result of the updates or revisions. Manufacturers should always submit updated Certification Review Sheets (CRSs) and Supplemental Data Sheets (SDSs) for each carryover engine family, e.g., changing the year at the top of each sheet and, as applicable, revising emission values for new worst-case configurations. In addition, manufacturers must resubmit all required statements of compliance (e.g., label durability, conformance with general standards, conformance with standards and test procedures, original equipment manufacturer compliance, etc.) for all carryover engine families.

The ARB anticipates that running changes and/or field fixes may occur to carryover engine families after certification. It is important that these changes be properly documented for each certification year. Accordingly, manufacturers must maintain an index of running changes/field fixes that occur. All running changes/field fixes will continue to be conducted and documented as required [Ref.: 3, Section 29 and Ref.: 4, Chapter 2.11, Paragraph 3(B), respectively].

POLICIES:

A. General

All ULGE manufacturers shall continue to provide letters of intent [Ref.: 4, Chapter 2.1] for each certification year.

B. New Engine Families

For new engine families (i.e., families that are certified for the first time, or families that do not qualify as carryover), the manufacturer shall submit complete applications that are completed according to the guidelines given in ARB Mail-out 92-57 [Ref.: 4]. All portions of the applications must reflect the applicable calendar year, for example, the engine family name and the emission control label.

C. Carryover Engine Families

1. For carryover engine families only, manufacturers are permitted to use either the complete application described in Mail-out 92-57, or the optional abbreviated application. The abbreviated application should consist of the following (as applicable):

    a. A three-ring binder with individual tab dividers for each carryover engine family to be certified. Divider pages are

recommended to separate specific portions of the application, such as revisions, correspondence, and running changes.

b. A signed cover letter requesting certification of the listed carryover engine family. The letter should provide a summary of the differences from the previous certification, and the page numbers of the original application that are affected by such differences. All applicable statements of compliance should be resubmitted. If the differences are too numerous to list, then it is acceptable to describe in general the types of changes. A sample cover letter is given in the Attachment.

c. All revised pages of the application necessary to reflect all differences from the previous year. For example, revised contact persons, updated California sales projection for the subject certification year, and revised technical information. Each revised page will be identified with the subject calendar year of certification and the original engine family name from which the information and emission data are being carried over.

d. Updated test engine selection information [Ref.: 4, Chapter 3.17.2] and corresponding emission data [Ref.: 4, Chapter 3.12] in the case where a new worst-case engine configuration is determined for the engine family.

e. Updated CRSs and SDSs for the subject certification year. It is not required that the first character in the carryover engine family name be changed on these sheets, e.g., "S" to "T". However, the correct numerical year should be displayed at the top of the sheets, and all other information updated where necessary, e.g., citations, emission data, etc. Manufacturers shall follow the latest format amendments to such sheets when issued by the ARB.

f. The emission control label may be carried over except when a running change affects one or more of the engine family's determinators; i.e., when the change creates a new engine family, thus a new engine family name. It is recommended that the range "1995-1998" be used in the compliance statement of the label.

g. The ECS warranty may be carried over if both parts of the warranty statement refer to "1995 and later" applicability, not a specific past year.

h. For subsequent running changes and field fixes, manufacturers shall submit documentation as explained in ARB Mail-out 92-57 [Ref.:4, Chapter 2.11, Paragraph 3(B)]. Those pages affected by the running change/field fix need to be submitted and maintained in sequential order. Additionally, each revised page will be identified with the subject calendar year of certification and the original engine family name from which the information and emission data are being carried over.

Attachment

**SAMPLE COVER LETTER
FOR SUBMISSION OF A
CARRYOVER APPLICATION**

Mr. R. B. Summerfield
Assistant Division Chief
Mobile Source Division
Air Resources Board
9528 Telstar Avenue
El Monte, CA 91731-2990

Subject: 1996 Carryover Certification of XYZ Engine Co. Engine Family SXY038UB24RA

Dear Mr. Summerfield:

XYZ Engine Co. (XYZ) hereby submits an application to the Air Resources Board (ARB) for the 1996 certification year which covers engine family SXY038UB24RA. This engine family was certified previously for the 1995 calendar year. Accordingly, XYZ requests that it be allowed to carryover all emission data in order to comply with certification requirements for 1996.

For the 1996 certification year, XYZ is adding a second spark plug as an alternate to that which the engine family was certified on; this plug is identified in Section 17 of the application. Production engines will be equipped with either the new plug or the original plug. The new plug is supplied by a different part supplier but is functionally identical to the original. Therefore, XYZ has determined based on its engineering evaluation that the original certification engine remains the worst-case configuration for the family.

The emission control label is the same as that certified for the 1995 calendar year. The above spark plug addition has no effect to the engine family's determinators and thus, XYZ requests carryover of the label without change to the engine family name or the compliance statement. The emission control warranty statement has been modified to reflect "1996 and later" so that it may be carried for 1997 and 1998.

Enclosed are additional revisions to this year's application as described below:

1. Section 1: Ms. Consultant has been added as an authorized technical representative.

2. Section 10: A new equipment application (two-stroke edger) has been added to Section 10.09.01.00.

3. Section 17: In Section 17.04.00.00, the part number for the new spark plug has been added.

   In Section 17.06.00.00, the projected California sales information has been updated for the 1996 calendar year.

The Certification Review Sheet and Supplemental Data Sheet have been revised to reflect 1996 certification information.

Please insert these pages behind the tab marked "SXY038UB24RA". They are identified as pages specific to the 1996 certification year by the denotation of the calendar year in the top right-hand corner of each page. The engine family name below it reflects the year from which the information and emission data are being carried over, i.e, "S" for 1995.

Lastly, XYZ makes the following statements regarding the 1996 certification of the carryover engine family SXY038UB24RA:

a. This engine family conforms with the general standards regarding an increase in emissions and unsafe conditions as presented in Section 5 of the "California Exhaust Emission Standards and Test Procedures for 1995 and Later Utility and Lawn and Garden Equipment Engines", amended May 26, 1995.

b. This engine family conforms with the California utility and lawn and garden equipment engine emission control label specifications as stated in Title 13, California Code of Regulations, Section 2404.

c. This engine family conforms with the standards and test procedure requirements for utility and lawn and garden equipment engines, and the test engine was tested in accordance with the applicable test procedures and meets the requirements of such tests.

d. Some engines within this engine family are sold as incomplete assemblies to original equipment manufacturers (OEMs). XYZ will ensure that these OEMs comply with the certified specifications for exhaust backpressure and air inlet restriction.

If you have any questions regarding this application, please contact me at (012) 345-6789.

Sincerely,

A. Z. Green
Director, Emission Certification

Enclosure